



**U.S. Department of Justice**

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**By Hand Delivery**

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**Re: United States v. Zheng, Ming Yan, et al., Cr. Case 05-00027**

Dear Counsel:

Enclosed are documents bates stamped ZHE00176 through ZHE00233, ZHE00258 through ZHE00268, ZHE00272 through ZHE00279, ZHE00415 through ZHE00416, and ZHE0454 through ZHE0468, which is the Jencks and Giglio material currently in our possession. Please note that Alfred Pangelinan's criminal conviction from the 1980s exceeds the 10 year limit on admissibility under Fed. R. Evid. 609(b).

Pursuant to Giglio, the government also makes the following disclosure. Wang, Lan Jung; Wang, Bin; Lian, Wei; Chi, Xiumei; and Yan, Hua were all enrolled in the federal Emergency Witness Assistance Program. The Program provides support to victims of and witnesses to federal crimes who have no other means of support (there is some information concerning the program enclosed). Wang, Lan Jun; Wang, Bin; and Yan, Hua were enrolled in the program from September 14 through December 13, 2005. Chi, Xiumei and Lian, Wei were enrolled in the program from September 14 through December 7, 2005. The government provided shared rooms at the Silver Resortel (which cost \$25 per night) and a per diem for food and other expenses of \$20 per day. After November 17, 2005, the per diem became \$10 per day. The government also assisted Chi, Xiumei and Lian, Wei with applications for parole into Guam; provided transportation to Guam; and once in Guam, put Chi and Lian into contact with Catholic Charities there. The government also assisted Yan, Hua with his application for a Temporary Work Authorization and provided return plane tickets to Wang, Lang Jun and Wang, Bin to China.


Prior to their enrollment in the Emergency Witness Assistance Program, the FBI Office of Victim Assistance provided \$125 each to Wang, Lan Jun; Wang, Bin; Chi, Xiumei; and Lian, Wei and provided shared rooms at the Silver Resortel from September 3 through September 17, 2005.

I was also informed today that Chi, Xiumei engaged in prostitution outside of the Tea House on approximately 4 to 6 occasions in July and August, 2005. Lian, Wei engaged in prostitution outside of the Tea House on approximately 10 occasions in July and August, 2005.

Sincerely,

LEONARDO M. RAPADAS  
United States Attorney  
Districts of Guam and the NMI

By:

  
TIMOTHY E. MORAN  
Assistant U.S. Attorney

enc.